

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
 : **Case No.: 18-10217**
Richard Cressman : **Chapter 13**
 : **Judge Ashely M. Chan**
Debtor(s). : *********

OBJECTION TO DEBTOR'S AMENDED CHAPTER 13 PLAN

Now comes Wells Fargo Bank, N.A. ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and files this Objection to Debtor's Amended Chapter 13 Plan, averring as follows:

1. Creditor is a creditor herein secured by a second mortgage lien upon the Debtor's real estate located at 1400 Fels Rd., Quakertown, PA 18951. Creditor has filed proof of claim number 2 for the subject mortgage loan in the amount of \$272,446.58, and reflecting a pre-petition arrears amount of \$29,019.17.
2. Debtor's Plan does not list Creditor's subject mortgage loan as a secured claim and makes no provision for curing Creditor's arrearage claim, nor for the maintenance of post-petition payments.
3. Creditor asserts that Debtor still holds an interest in the property. As such, Creditor requests that the Plan be amended to provide for Creditor's claim or to surrender said interest.

WHEREFORE, Creditor respectfully requests the Court to deny confirmation of the Debtor's proposed Amended Chapter 13 Plan.

Respectfully submitted,

/s/ Adam B. Hall
Sarah E. Barngrover (323972)

Kimberly A. Bonner (89705)
Adam B. Hall (323867)
Karina Velter (94781)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
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Attorneys for Creditor
The case attorney for this file is Karina
Velter.
Contact email is kvelter@manleydeas.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection to Debtor's Amended Chapter 13 Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Zachary Perlick, Attorney for Richard Cressman, 1420 Walnut Street, Suite 718, Philadelphia,
PA 19102, Perlick@verizon.net

The below listed parties were served via regular U.S. Mail, postage prepaid, on September 28,
2018:

Richard Cressman and Phyllis A. Cressman, 1400 Fels Rd, Quakertown, PA 18951

Wells Fargo Home Mortgage, PO Box 10335, Des Moines, IA 50306

DATE: 09/28/2018

/s/ Adam B. Hall

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

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Attorneys for Creditor

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